## Table 1. Emissions Units 001, 002, 003, 004, 006, 009, 011, 012, 013, 014 Monitoring Approach

| | **Indicator No. 1** | **Indicator No. 2** |
|---|---|---|
| I. Indicator | Visible emissions | Baghouse pressure differential |
| Measurement Approach | Visible emissions from the baghouses will be checked daily during operation using EPA Reference Method 22 procedures.<br><br>A minimum 30-minute Method 9 observation will be performed annually on each baghouse.<br><br>A minimum 12-minute Method 9 observation is required for any baghouse with pressure differential reading greater than 6” H2O to confirm compliance with the visible emission standard. | Measured separately at each of ten baghouses using differential pressure gauges or manometers. The pressure differential is measured continuously while the baghouses are in operation. |

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| II. Indicator Range | An excursion is defined as the presence of visible emissions when conducting Method 22 observations.<br><br>An exceedance is defined as an opacity greater than 5 percent (6-min. avg.) when conducting a Method 9 test.<br><br>Excursions and exceedances trigger corrective action and a reporting requirement. The corrective action should include immediate start-up and operation of the baghouse or shutdown of the material handling system.<br><br>Exceedances also require immediate notification to the EPC. | <table><tr><th>Source ID</th><th>Baghouse ID</th><th>Indicator Range</th></tr><tr><td>001</td><td>H</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>002</td><td>South</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>003</td><td>A</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>004</td><td>B</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>006</td><td>D</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>009</td><td>G</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>011</td><td>SE – I</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>012</td><td>SW – II</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>013</td><td>NW – III</td><td>0 – 8 in. $H_2O$</td></tr><tr><td>014</td><td>NW –IV</td><td>0 - 8 in. $H_2O$</td></tr></table><br>Pressure differential outside the indicator range does not constitute an excursion unless accompanied by visible emissions, while handling material.<br><br>Pressure differential outside the indicator range may indicate a problem with the baghouse, which should trigger an inspection of the baghouse system. |
| QIP Threshold | For visible emissions, the QIP Threshold is 4 excursions in a 6-month reporting period. | Since excursions for baghouse pressure differential are also contingent upon visible emissions observations, the QIP Threshold is also 4 excursions in a 6-month reporting period. |

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| III. Performance Criteria | Observations are performed at the baghouse exhaust while the baghouse is operating, or at any point on the conveying system where visible emissions are noted. | The pressure differential gauges or manometers measure the pressure differential between the inlet and the outlet of the baghouses. |
| A. Data Representativeness | See above | An average recording of pressure differential readings during annual visible emissions testing will be used to verify that the selected range of pressure differential is adequate as an indicator of particulate emissions (as measured by visible emissions testing). |
| B. Verification of Operational Status | Visible emissions will be monitored once yearly using EPA Reference Method 9 procedures with a minimum of 30-minute observations per unit. | Pressure differential will be recorded with annual Method 9 tests for each baghouse in operation. |
| C. QA/QC Practices and Criteria | Method 22: Observer will be familiar with the EPA Reference Method 22 and follow Method 22 procedures during observations.<br>Method 9: Observer is certified every six months.<br><br><u>Daily (when in operation)</u><br>1. Observe stack (visual).<br>2. Conduct a minimum 12-minute Method 9 visible emission test on the corresponding baghouse if the pressure differential is greater than 6" H2O. | Liquid manometers are not required to be calibrated. During use, each unit is visually checked to determine that it is functioning properly, that there are no leaks, and no excessive vibration.<br><br><u>Daily (when in operation)</u><br>1. Check pressure drop, and record in log book.<br>2. Walk through system listening for proper operation (audible leaks, proper fan and motor functions, bag cleaning systems, etc.).<br>3. Note any unusual occurrence in the process being ventilated.<br>A QA inspection of the pressure measurements will be conducted once yearly by an independent auditor. |

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| D. Monitoring Frequency | Method 22: Daily instantaneous observations when baghouses are in operation.<br>Method 9: Annual 30-minute observation. | Pressure differential will be monitored once per day during the operation of the baghouse(s). |
| Data Collection Procedure | Method 22 observations are recorded as part of the daily inspection process.<br>Method 9 observations (minimum 30-minutes) are conducted annually by a certified observer on each unit. A minimum 12-minute Method 9 visible emission observation is conducted on the corresponding baghouse if the pressure differential is greater than 6" H2O.<br>All records are maintained on site. | Pressure differential and hours/time of baghouse operation will be recorded in a logbook. |
| Averaging Period | Method 22: Instantaneous<br>Method 9: 6-minute average | One pressure differential reading during operation |